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Special Litigation and Enforcement Counsel to the Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**SUPPLEMENTAL DECLARATION OF JASON P. GOTTLIEB IN
SUPPORT OF THE APPLICATION AUTHORIZING EMPLOYMENT
AND RETENTION OF MORRISON COHEN LLP AS SPECIAL
COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION**

I, JASON GOTTLIEB, pursuant to 28 U.S.C. § 1746, do hereby state and declare as follows:

1. I am over the age of eighteen (18), have been duly admitted to the practice of law in the State of New York and other federal courts, and am a Partner of the firm of Morrison Cohen LLP (“MC”), which maintains its only office for the practice of law at 909 Third Ave, 27th Floor, New York, New York 10022.

2. I am fully familiar with the facts hereinafter stated, and am authorized to make this supplemental declaration (“**Supplemental Gottlieb Declaration**”) on behalf of MC. The information contained in this Supplemental Gottlieb Declaration is based on my own personal

¹ The debtors (“**Debtors**”) in the above-captioned jointly-administered cases (“**Chapter 11 Cases**”) are: (i) Genesis Global Holdco, LLC (8219); (ii) Genesis Global Capital, LLC (8564); and (iii) Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, New York 10003.

knowledge, discussions with my partners, associates, and staff at MC, or is derived from my review of the file in these cases.²

3. I submit this Supplemental Gottlieb Declaration to provide continuing disclosures as required pursuant to Sections 327 and 328 of Title 11 of the United States Code and Bankruptcy Rule 2014(a), regarding MC's representation of the Debtors as special litigation and enforcement counsel.

4. This Supplemental Gottlieb Declaration is submitted to supplement the *Declaration of Jason Gottlieb in Support of the Application Authorizing Employment and Retention of Morrison Cohen LLP as Special Counsel for the Debtors and Debtors-In-Possession* [ECF No. 71], dated February 8, 2023. After a hearing on February 22, 2023, MC's retention was approved by this Bankruptcy Court *nun pro tunc* to January 19, 2023 (*i.e.*, the Petition Date) in an order entered on the docket in the Chapter 11 cases on February 24, 2023 [ECF No. 106].

5. MC files this Supplemental Gottlieb Declaration to identify connections to parties-in-interest appearing in these Chapter 11 Cases as set forth on **Exhibit A** annexed to this Supplemental Gottlieb Declaration. As disclosed in **Exhibit B**, MC has in the past represented, currently represents, and may in the future represent parties-in-interest in the Chapter 11 Case, in matters unrelated to these Chapter 11 Cases.

6. MC will continue to research connections with respect to its representation of the Debtors in these Chapter 11 Cases, and reserves and preserves the right to supplement its disclosures as necessary in order to disclose any conflicts or connections as appropriate.

² Certain of the disclosures set forth herein may relate to matters not within my personal knowledge, but rather within the personal knowledge of other attorneys or staff at MC. Any such disclosures are based on information provided by them to me.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 14, 2023

/s/ Jason P. Gottlieb
Jason P. Gottlieb
Partner, Morrison Cohen LLP

Exhibit A

Potential Parties-in-Interest

Official Committee of Unsecured Creditors' Professionals

White & Case LLP

Members of Official Committee of Unsecured Creditors

SOF International, LLC
Teddy Andre Amadeo Gorisse
Digital Finance Group Co.
Richard R. Weston

Litigation Counterparties

[REDACTED]

EXHIBIT B¹

| <u>Connection Party</u> | <u>Morrison Cohen Relationship</u> |
|--------------------------------|--|
| White & Case LLP | White & Case LLP is a Former Morrison Cohen Client and is Former Client Friendly and Former and Current Adverse Party in matters unrelated to these chapter 11 proceedings. |
| SOF International, LLC | SOF International did not generate any direct hits; however, a search of the term “SOF” resulted in possibly related entities that are Current Adverse Parties in matters unrelated to these chapter 11 proceedings. |
| [REDACTED] | [REDACTED] is a Current Adverse Party in a matter unrelated to these chapter 11 proceedings. |

¹ Party relationships are classified as: (i) Client; (ii) Former Client (no active matters are attributed to the client because all amounts have been billed and the entity or individual is no longer considered a client); (iii) Adverse; (iv) Other Interested Party (a party that is not a Client, a Former Client, Client Friendly, or Adverse); (v) Client Friendly (a party who refers a client to Morrison Cohen; an affiliate of a client; possibly an officer or party who is not adverse to a client; or a party who is generally aligned with a Morrison Cohen client); (vi) Current Creditor (a party who is involved in another bankruptcy case involving an appearance by Morrison Cohen); (vii) Consumer Connection (a party with whom Morrison Cohen attorneys have some de minimis or consumer level connection, e.g., utility, credit card, or other personal goods or services); or (viii) Morrison Cohen Vendor (a party to whom Morrison Cohen has issued a check, settlement payment, or paid for goods and services in the course of its business).